

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 21-CR-0005

JOHN D. WHELAN,

Defendant.

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MOTION TO SEAL

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NOW COMES the United States of America, by its attorneys, Richard G. Frohling, United States Attorney for the Eastern District of Wisconsin, and Julie F. Stewart and Kevin C. Knight, Assistant United States Attorney for said district, and hereby moves the Court, pursuant to Rule 79(d) of the General Local Rules of the United States District Court for the Eastern District of Wisconsin, for an order sealing Exhibits 1 and 2 to **Government's Response to Defendant's Motion for Return of Property** filed on April 26, 2022, in the above-named case until further order of this Court.

As a basis for said motion, the government relies upon the facts and circumstances described in said submission.

Respectfully submitted this 26th day of April, 2022 at Milwaukee, Wisconsin.

Respectfully submitted,

RICHARD G. FROHLING  
United States Attorney

By: */s/ Julie F. Stewart*

JULIE F. STEWART  
KEVIN C. KNIGHT  
Assistant United States Attorneys